

**NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP**  
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January 6, 2021

**By Electronic Mail and First Class Mail**

Ms. Sheri L. Bianchin  
 Remedial Project Manager  
 Institutional Controls Coordinator  
 U.S. Environmental Protection Agency Region 5  
 77 West Jackson Boulevard (SR-6J)  
 Chicago, IL 60604

**Re: NL Industries/Taracorp Superfund Site; Granite City, Illinois**  
**Consent Decree – Quarterly Progress Report 60 (October-December 2020)**

Dear Ms. Bianchin:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the “site”), two copies of this letter are submitted, on behalf of the NL Industries/Taracorp Superfund Site Group (“Group”), to provide the U.S. Environmental Protection Agency (“EPA”) with a quarterly progress report for activities performed during the period from October-December 2020.

**1. Actions Taken During Previous Quarter to Comply with the Consent Decree:**

- **Institutional Controls:** In October 2020, the Group provided electronic files to EPA containing draft documents related to 15 denied access residential properties. During the October-December 2020 period, the Group also initiated efforts to perform title searches for use with 10 draft environmental covenants, including the draft environmental covenants for the 1555 State Street property; the Unknown Road (Taracorp) property; the [REDACTED] Non-responsive [REDACTED]; the Taracorp pile property; the Mayco (Illinois), LLC property; the Terminal Railroad Association property; the U.S. Carriers Inc. property; the Transload Realty property; and the [REDACTED] Non-responsive [REDACTED].
- **Petition for Partial Deletion:** Based upon communications with EPA, the Group initiated efforts in December 2020 to prepare a petition for partial deletion.
- **Remote Fill Properties:** Based upon communications with EPA, the Group initiated efforts in December 2020 to prepare an outline/protocol for soil sampling on several remote fill properties.
- **Operation and Maintenance:** During the October-December 2020 period, the Group’s project coordinator continued to prepare a revised Operation and Maintenance Plan to update the Group’s 2002 Operation and Maintenance Plan. In addition, the following operation and maintenance activities were performed at the site:

October 1	The Group's project coordinator requested information from Munie Greencare Professionals ("Munie") regarding the herbicide used for vegetation control on the 1555 State Street property in Granite City.
October 1	The Group's project coordinator sent an email to the owner/operator of All Pallet Services regarding the status of fence repairs along the southwestern side of the Taracorp pile property.
October 20	The Group's project coordinator sent a follow-up email to the owner/operator of All Pallet Services regarding the status of fence repairs along the southwestern side of the Taracorp pile property.
October 20	The Group's project coordinator sent an email to Munie's project manager to confirm Munie's schedule for the final mowing of vegetation on the 1555 State Street and Taracorp pile properties in 2020.
October 27	Munie completed the final 2020 mowing of vegetation on the 1555 State Street and Taracorp pile properties.
November 9	The Group's project coordinator performed a semi-annual operation and maintenance inspection at the site.
November 12	Munie reseeded the strip of soil between the sidewalk and State Street along the 1555 State Street property.
December 1	The Group's project coordinator sent a letter to EPA to provide log sheets and photographs documenting the results of the November 9 semi-annual operation and maintenance inspection and the November 10 annual site visit with Illinois EPA.
December 10	The Group's project coordinator sent an email with questions to Munie's project manager regarding Munie's proposal for 2021 lawn maintenance services on the 1555 State Street and Taracorp pile properties at the site.

- **Project Coordination:** During the October-December 2020 period and in addition to items previously noted, the Group's project coordinator performed the following work related to the site:

October 2	Spoke to EPA's project manager in regard to institutional controls, operation and maintenance, and other activities related to the site.
October 5	Submitted Quarterly Progress Report 59 to EPA.
October 5	In response to a request from EPA's project manager, sent 15 Word files to EPA, each containing either a draft Notice of Possible Soil Contamination or a draft Notice of Soil Contamination for the 15 denied access residential properties at the site.
October 5	In response to a request from EPA's project manager, sent 15 Word files to EPA, each containing a draft administrative record index cover page for the 15 denied access residential properties at the site.
October 8	Sent an email to EPA and Illinois EPA regarding the schedule for the

	annual site visit on November 10, 2020.
October 14	Sent an email to EPA and Illinois EPA to confirm the schedule for the annual site visit on November 10, 2020.
October 16	Spoke to EPA's project manager in regard to institutional controls, operation and maintenance, and other activities related to the site.
October 16	Received an email and letter from EPA's project manager requesting additional sampling on five remote fill properties. Sent an email to EPA's project manager to acknowledge receipt of EPA's October 16, 2020 email and letter.
October 16	Received an email from EPA's project manager regarding the November 10, 2020 annual site visit.
October 16	Received an email from EPA regarding EPA's indirect cost rates and notified the Group's representatives.
October 19	Sent an email to EPA's project manager to confirm the Group's interest in speaking with EPA in regard to EPA's October 16, 2020 letter regarding five remote fill properties.
October 26-28	Communicated with EPA, Illinois EPA, and the Group regarding a conference call relating to remote fill properties.
October 30	Sent agenda to EPA, Illinois EPA, and the Group for the November 2, 2020 conference call.
November 2	Participated in a conference call with EPA, Illinois EPA, and the Group's representatives regarding the remote fill properties.
November 9	Performed a semi-annual operation and maintenance inspection at the site.
November 10	Participated with Illinois EPA's representative in the annual site visit.
November 20	Received a request to participate in a conference call with EPA and Illinois EPA to discuss several remote fill properties.
December 1	Sent a letter to EPA to provide log sheets and photographs documenting the results of the November 9 semi-annual operation and maintenance inspection and the November 10 annual site visit with Illinois EPA.
December 1	Received an email from EPA's project manager that included an agenda for the December 2 conference call.
December 1	Spoke to the City of Venice attorney in regard to his efforts to prepare the draft Venice roadways ordinance.
December 2	Participated in a conference call with EPA and Illinois EPA and discussed several remote fill properties.
December 2	Sent the Master List for Stack Emissions Properties to EPA in response to a request from EPA's project manager.
December 2	Sent an email to Illinois EPA to respond to a December 1 email

	regarding the application of dust suppressant on Mayco Industries property.
December 2	Received information from EPA related to partial site deletion justification.
December 8	Received additional information from EPA's project manager regarding the petition for partial deletion, including the need to use tax parcel identification numbers.
December 9	Sent an email to EPA's project manager regarding partial site deletion, including acknowledgement of the need to use tax parcel identification numbers.
December 10	Sent an email to EPA's project manager to indicate that the Group is continuing to discuss the remote fill properties and that the Group will prepare a draft outline/protocol for soil sampling on those properties.
December 10	Sent an email to EPA's project manager to acknowledge that the Group will prepare the partial deletion support document for the site, with the goal of sending it to EPA by March 31, 2021.
December 11	Spoke to EPA's project manager regarding the data tables to be included in the petition for partial deletion.
December 11	Sent an email to EPA's project manager to provide confirmation of the Group's payment of EPA's bill.
December 29	Spoke to Illinois EPA's Collinsville representative, and received an email, regarding his work status and the new address of Illinois EPA's Collinsville office.

**2. Summary of Data and/or Results of Sampling and Tests Received:**

- Not applicable for this reporting period.

**3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Quarter:**

- Not applicable during this reporting period.

**4. Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:**

- The Group will continue to perform operation and maintenance activities at the site, as required. As part of those activities, the Group will continue to prepare an updated operation and maintenance plan.
- The Group anticipates that Munie will respond to the Group's December 10, 2020 questions on Munie's 2021 contract for lawn maintenance services. Upon receipt of Munie's responses, the Group anticipates that a contract will be finalized.

- The Group will continue to perform title searches, as part of efforts to finalize environmental covenants.
- The Group will continue to prepare the petition for partial deletion justification with the goal of submitting it to EPA by March 31, 2021.
- The Group will continue to prepare a draft outline/protocol for soil sampling for several remote fill properties. The draft document will be submitted to EPA upon completion.
- The Group will address comments, if any are received, on the draft administrative records, draft notices of soil contamination, and draft notices of potential soil contamination for 15 denied access residential properties that were submitted to EPA and Illinois EPA in September 2019 and October 2020.
- The Group anticipates that additional discussions will occur with the Venice attorney in regard to the Venice roadways ordinance.
- The Group will continue to monitor All Pallet Services' efforts to repair the fence along the south side of the Taracorp pile.
- The Group will continue to address EPA's comments, update the Institutional Controls Work Plan, and implement institutional controls as the scope of institutional controls activities are finalized.
- The Group will address comments, if any are received from EPA, in regard to the Five-Year Review Groundwater Monitoring Report, which was submitted to EPA in February 2019 to document the results of the November 2018 groundwater monitoring event.
- The Group will address comments, if any are received from EPA, in regard to: (1) the Soil Sampling and Analysis Report, which was submitted to EPA in January 2014 to document the results from soil sampling activities at 73 residential properties in April-May 2011, September 2012, June 2013, and October 2013; (2) the Soil Sampling and Analysis Report Addendum, which was submitted to EPA in December 2015 to document the results of soil sampling performed on three residential properties Non-responsive in June 2015 and one residential property Non-responsive in November 2015; and (3) the Soil Sampling and Analysis Report Addendum No. 2, which was submitted to EPA in September 2016 to document the results of soil sampling activities performed on three residential properties Non-responsive in August 2016.

**5. Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- During the May 2019 operation and maintenance inspection, the Group's project coordinator observed scattered hard rubber battery case chips in the surface soil in several areas on a vacant lot on Harrison Street in Eagle Park Acres where vegetation appeared to have been recently cleared. The Group's project coordinator notified EPA

about this matter on May 24, 2019 and examined the property with EPA and Illinois EPA during the November 2019 site visit. As indicated above, the Group will continue to prepare a draft outline/protocol for soil sampling on several remote fill properties, including the Harrison Street property.

**6. Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- As indicated above, the Group is preparing a petition for partial deletion. The Group currently anticipates that the petition for partial deletion will be submitted to EPA by March 31, 2021.

**7. Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

- Not applicable for this reporting period.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

**MONTROSE AGC**



Jeffrey A. Leed  
Project Coordinator

cc: Nicole Wood-Chi, Esq. – U.S. Environmental Protection Agency (by electronic mail)  
Christopher Grubb, Esq. – U.S. Environmental Protection Agency (by electronic mail)  
Mr. Brian Conrath - Illinois EPA (by electronic mail and first class mail)  
Mr. Tom Miller – Illinois EPA (by electronic mail)  
Technical Committee, NL Industries/Taracorp Superfund Site Group (by electronic mail)